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*Representing the United States of America*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,	)	Case No.: 2:19-mj-138-CWH-1
	)	
Plaintiff,	)	
	)	
vs.	)	STIPULATION TO CONTINUE
	)	PRELIMINARY HEARING
JORGE ARMANDO GOMEZ-VARGAS,	)	(Third Request)
	)	
Defendant.	)	

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Linda Mott, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Nisha Brooks-Whittington, Assistant Federal Public Defender, counsel for defendant JORGE ARMANDO GOMEZ-VARGAS, that the preliminary hearing in the above-captioned matter, currently scheduled for May 13, 2019, at the hour of 4:00 p.m., be vacated and continued for forty-five (45) days or to a date and time convenient to the Court.

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1 This stipulation is entered into for the following reasons:

2 1. The parties are resolving this matter prior to indictment.

3 2. Defendant is in custody.

4 3. Denial of this request for continuance of the preliminary hearing would  
5 prejudice both the defendant the Government and unnecessarily consume this Court's  
6 valuable resources, taking into account the exercise of due diligence.

7 4. Additionally, denial of this request for continuance could result in a  
8 miscarriage of justice.

9 5. The additional time requested by this stipulation, is excludable in computing  
10 the time within which the defendant must be indicted and the trial herein must commence  
11 pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b) and § 3161(h)(8)(A), considering the  
12 factors under 18 U.S.C. § 3161(h)(8)(B)(I) and (iv).

13 DATED this 10<sup>th</sup> day of May, 2019.

14 Respectfully submitted,

15 NICHOLAS A. TRUTANICH  
16 United States Attorney

17 /s/ Nisha Brooks-Whittington  
18 NISHA BROOKS-WHITTINGTON  
Counsel for defendant  
JORGE ARMANDO GOMEZ-VARGAS

/s/ Linda Mott  
LINDA MOTT  
Assistant United States Attorney

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